

U.S. Department
of Transportation
**United States
Coast Guard**



Commandant
U.S. Coast Guard

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28 Aug 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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Dear Ms. Searcy:

Federal Communications Commission
Office of the Secretary

The U.S. Coast Guard is pleased to submit the following Comments in response to the FCC Notice of Proposed Rule Making in ET Docket No. 92-165, Revision of Part 15 of the Rules to Expand the Restricted Bands of Operation.

The Coast Guard supports the Commission's efforts to restrict ship-to-shore GMDSS distress and safety frequency bands from the operation of Part 15 intentional radiators. However, we believe that certain shore-to-ship GMDSS frequency bands should also be restricted from the operation of these devices. We also note that the SSB radiotelephone frequency bands contained in Appendix B of the Notice have incorrect band limits.

The shore-to-ship GMDSS frequency bands 517.75-518.25 kHz, 4209.25-4209.75 kHz, 4209.75-4210.25 kHz, 6313.75-6314.25 kHz, 8416.25-8416.75 kHz, 12578.75-12579.25 kHz, 16806.25-16806.75 kHz, 19680.25-19680.75 kHz, 22375.75-22376.25 kHz, and 26100.25-26100.75 kHz, are used by Coast Guard shore radio stations to disseminate maritime safety information to ships at sea. Also, these same frequency bands will be used to transmit distress alert relays to other ships, including ships that may be in the vicinity of the vessel in distress, in accordance with ITU Radio Regulations N 3117 and N 3118.

The Notice does not include these GMDSS frequency bands in its Appendix B because the ITU Radio Regulations (Mob-87) state only that emissions causing harmful interference in these bands are prohibited. We strongly believe that, because of recent regulatory relaxations (subsequent to Mob-87 decisions) on the manufacture and importation of Part 15 intentional radiators and the anticipated proliferation of these devices on vessels, these devices must also be restricted from operating in bands that are used to relay distress alerts to ships that may be in a position to assist another vessel in distress.

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We are also very concerned about the aggregate harmful interference effects which could be produced by numerous Part 15 intentional radiators operating in these frequency bands in a shipboard environment. Possible uses of these devices on board ships include, and are not limited to, security and alarm systems, data and computer communications systems, and personal communications systems.

Clearly, harmful interference from one or more Part 15 intentional radiators used on these ships could delay or prevent the reception of a distress alert relay which could result in loss of life and property. Therefore, we strongly recommend that the Commission add these shore-to-ship GMDSS frequency bands to the list of restricted frequency bands in 47 CFR Section 15.205.

Finally, with regard to the SSB radiotelephone frequencies listed in Appendix B, Section IV, of the Notice, Chapter IX of the ITU Radio Regulations (1990 edition) identifies these as carrier frequencies. Radio Regulation 4325 (Mob 83) states that the assigned frequency shall be 1.4 kHz higher than the carrier frequency; therefore the bandwidth should be 2.8 kHz, not +/-1.5 kHz as specified in the Notice. The corresponding radiotelephone frequency bands identified in Appendix B should be corrected to be 4125-4128 kHz, 6215-6218 kHz, 8291-8294 kHz, 12290-12293 kHz, and 16420-12423 kHz, respectively.

Sincerely,


JOSEPH D. HERSEY, JR
CHIEF, MARITIME RADIO & SPECTRUM MANAGEMENT DIVISION
BY DIRECTION

Copy: Mr. John Reed, FCC Office of Engineering and Technology
Ms. Katy Hosford, FCC Private Radio Bureau

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